PERMIT AMENDMENT NO. 2051-121-0919-S-01-2 ISSUANCE DATE:



ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Permit Amendment

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. 2051-121-0919-S-01-0 issued on January 10, 2013 to:

Facility Name: Hartybake

Facility Address: 6160 Boat Rock Blvd. SW

Atlanta, Georgia 30336 (Fulton County)

Mailing Address: 6160 Boat Rock Blvd. SW

Atlanta, Georgia 30336

Facility AIRS Number: 04-13-121-00919

for the following: Operation of a commercial bakery

is hereby amended as follows: Increase in emissions from baking lines with RACT analysis

Reason for Amendment: Application No. 27063 dated April 29, 2019

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 page(s).

This Permit Amendment is hereby made a part of Permit No. 2051-121-0919-S-01-0 and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.



Richard E. Dunn, Director Environmental Protection Division

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2. Allowable Emissions

MODIFIED CONDITION

2.1 The Permittee shall not discharge nor cause the discharge into the atmosphere from the entire facility volatile organic compound (VOC) emissions in an amount equal to or exceeding 50 tons during any consecutive twelve-month period.

[RACT Analysis and 40 CFR 51.165]

NEW CONDITION

2.5 The Permittee shall not discharge nor cause the discharge into the atmosphere from the baking lines volatile organic compound (VOC) emissions in an amount equal to or exceeding 40 tons during any consecutive twelve-month period.

[RACT Analysis and 40 CFR 51.165]

NEW CONDITION

- 2.6 The Permittee shall use the best practice in the workplace as following: [391-3-1-.02(2)(tt) RACT]
 - a. Use of powder flavorings where possible

6. Performance Testing

NEW CONDITION

6.2 The Permittee may conduct tests to determine the VOC retention of the flavorings in the final baked products. Until tests are conducted and approved by the Division, the Permittee shall assume that all VOCs from the flavorings are emitted.

7. Notification, Reporting and Record Keeping Requirements

MODIFIED CONDITION

- 7.1 The Permittee shall retain the following records:
 - a. Yeast content(s)
 - b. Yeast action time(s)
 - c. Pounds of bread and waffle products produced for each dough formulation used at the bread baking operation
 - d. Amount of each VOC-containing flavoring used per month
 - e. Percent by weight effective VOC content of each VOC-containing flavoring used
 - f. Monthly billing records for natural gas

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g. Monthly purchase records of all cleaning and sanitizing chemicals

All calculations used to figure usages or production amounts should be kept as part of the monthly record. These usage records shall be kept available for inspection or submittal for five years from the date of record.

MODIFIED CONDITION

7.2 The Permittee shall determine volatile organic compound (VOC) emissions from the yeast via emission factors derived from a mathematical model based on source testing as presented in EPA Publication 453/R-92-017 titled "Alternative Control Technology Document for Bakery Oven Emissions." The equations are as follows:

VOC E. F.
$$\#X = (0.95 \% Yi) + (0.195 \% ti) - (0.51 \% S) - (0.86 \% ts) + 1.90$$

and

Total VOC = \sum (VOC E. F. #X * Q / 2000)

where:

VOC E. F.#X = VOC Emission Factor from yeast, in pounds of VOC per ton of baked bread, for bread formulation number X. Each formulation which results in a change in the variables below must have a different VOC Emission Factor.

VOC = Monthly VOC emissions from yeast (tons per month)

Yi = Initial baker's percent of yeast to the nearest tenth of a percent (baker's percent of an ingredient refers to the weight of that ingredient per 100 pounds of flour in the formula).

ti = Total yeast action time, in hours, to the nearest tenth of an hour (includes all time between the moment the yeast comes in contact with water and the moment the bread and/or waffle enters the oven)

S = Final (spike) baker's percent of yeast to the nearest tenth of a percent.

ts = Spiking time in hours to the nearest tenth of an hour.

Total VOC = Monthly VOC emissions (tons per month)

Q = Quantity of baked bread and/or waffles (tons per month)

2000 = Conversion factor from pounds to tons

NEW CONDITION

7.3 The Permittee shall use the monthly records required in Condition 7.1 to determine the VOC emissions from natural gas combustion for each calendar month. VOC emissions shall be based on the emission factor from AP-42, Chapter 1.4.

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NEW CONDITION

7.4 The Permittee shall use the monthly records required in Condition 7.1 to determine the VOC emissions from the use of flavors for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOCt = \left[\left(\sum_{j=1}^{m} VOCj \right) \right] \div 2000$$

where:

VOCt = Flavor VOC emissions (tons/month)

VOCj = Effective VOC content in flavor (%) * Flavor usage (pounds/month)

m = Number of VOC-containing flavors

NEW CONDITION

7.5 The Permittee shall use the monthly records required in Condition 7.1 to determine the VOC emissions from the use of cleaning and sanitizing chemicals for each calendar month. VOC emissions shall be calculated using the following equation:

$$VOCt = \left[\left(\sum_{j=1}^{m} VOCj \right) \right] \div 2000$$

where:

VOCt = Cleaning and sanitizing chemicals / VOC emissions (tons/month)

VOC_j = VOC content in cleaning and sanitizing chemicals (%) * Cleaning and

sanitizing chemicals usage (pounds/month)

m = Number of VOC-containing cleaning and sanitizing chemicals

MODIFIED CONDITION

7.6 The Permittee shall use the monthly records required in Condition 7.1 and the VOC emissions calculations in Conditions 7.2 to 7.5 to calculate total monthly volatile organic compound emissions from the facility. All variables used in the calculation, including any Division-approved emission factors, shall be kept as part of the monthly records. The Permittee shall notify the Division in writing if the total VOC emissions exceed 4.16 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1.

[391-3-1-.02(6)(b)1 and 391-3-1.03(2)(c)]

MODIFIED CONDITION

7.7 The Permittee shall use the calculations required by Condition 7.6 to determine the total VOC emissions from the facility for each twelve consecutive month period. The Permittee shall notify the Division in writing if the total VOC emissions equal or exceed 50 tons during any twelve consecutive month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.1.

[391-3-1-.02(6)(b)1 and 391-3-1.03(2)(c)]

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NEW CONDITION

7.8 The Permittee shall use the monthly records required in Condition 7.1 and the VOC emissions calculations in Conditions 7.2 to 7.4 for the baking operations to calculate total monthly volatile organic compound emissions from the baking lines. All variables used in the calculation, including any Division-approved emission factors, shall be kept as part of the monthly records. The Permittee shall notify the Division in writing if the total VOC emissions from the baking lines exceed 3.3 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.2.

[391-3-1-.02(6)(b)1 and 391-3-1.03(2)(c)]

NEW CONDITION

7.9 The Permittee shall use the calculations required by Condition 7.8 to determine the total VOC emissions from the baking lines for each twelve consecutive month period. The Permittee shall notify the Division in writing if the total VOC emissions the baking lines equal or exceed 40 tons during any twelve consecutive month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.2.

[391-3-1-.02(6)(b)1 and 391-3-1.03(2)(c)]